

PD-0086-18

STATE OF TEXAS

Petitioner

v.

DEONDRE JENKINS

Respondent

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§
§

IN THE TEXAS COURT

OF CRIMINAL APPEALS

AUSTIN, TEXAS

FILED
COURT OF CRIMINAL APPEALS
5/18/2018
DEANA WILLIAMSON, CLERK

STATE'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF ON THE MERITS

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Nicholas "Nico" LaHood, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State's Brief in the above styled cause.

I. STATEMENT OF THE CASE

This court granted the State's petition for discretionary review on April 18, 2018. The State's brief was due May 18, 2018. This is the State's first request for an extension.

II. REASONS FOR THE REQUEST

First, the undersigned counsel is working on, or has completed, briefs in the following appeals:

- *McKinney v. State*, 04-17-00495-CR, filed March 2, 2018;
- *In the Interest of I.P.*, 04-17-00724-CV, filed March 22, 2018;

- *Garcia v. State*, 04-17-00430-CR, filed April 30, 2018;
- *In the Interest of V.L.M.*, 04-18-100-CV, filed May 14, 2018; and
- *In the Matter of B.B.*, 04-18-00108-CV, due June 6, 2018.

Second, the undersigned counsel was recently providing assistance in the trial courts for the following cases:

- *State v. Lucero*, 2016-CR-10977, murder, second chair attorney, April 2, 2018 trial date and April 26, 2018 punishment hearing;
- *State v. Herrera*, 2017-CR-8710A, continuous trafficking of persons;
- *State v. Longoria*, 2017-CR-7801, murder; and
- *State v. Dorch*, 2016-CR-9222B, injury to a child (first degree).

Third, the undersigned counsel was out of the office April 25-27, 2018, and May 2-4, 2018.

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time for an additional 15 days to file the brief in this case.

Respectfully submitted,

NICOLAS “NICO” LAHOOD
Criminal District Attorney
Bexar County, Texas

/s/ Laura E. Durbin

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CERTIFICATE OF SERVICE

I, Laura E. Durbin, Assistant District Attorney, Bexar County, Texas, certify that a copy of the foregoing motion has been delivered by email to Debra Parker and the office of the State Prosecuting Attorney in accordance with Rules 6.3(a), 9.5(b), and 68.11 of the Texas Rules of Appellate Procedure.

/s/ Laura E. Durbin

Laura E. Durbin

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